

Date	Hours	Activity category	Description	Rate (\$)	Billable (\$)	Non-billable (\$)	Non-billable Hrs	User	Role
11/5/20	1.2	Communicate with Client	Full intake; gather information. Pulling spreadsheet off of TypeForm, editing, uploading to SP, and tasking Penn to review; beautifying Clio matter, creating SP folders	\$ 95.00	\$ 114.00			Lauren Pyles	Client Relations Specialist
11/5/20	0.2	Analysis/ Substantive Review	Review Full Intake & Decide Whether to Invite for Attorney Consult	\$ 450.00	\$ 90.00			Penn Dodson	Partner
11/6/20	0.5	Filing - Electronic (Basic)	Downloading CDOX received via email, saving as PDF, uploading to CDOX in SP	\$ 95.00	\$ 47.50			Lauren Pyles	Client Relations Specialist
11/6/20	0.1	Compose/Send Email		\$ 95.00		\$ 9.50	0.1	Lauren Pyles	Client Relations Specialist
11/6/20	0.1	Admin - General Admin	Updating Clio matter and Zoho with atty meeting date, running Zoho macro	\$ 95.00		\$ 9.50	0.1	Lauren Pyles	Client Relations Specialist
11/9/20	0.1	Read/review incoming email or correspondence	Downloading CDOX (videos) received from Sade and uploading to SP	\$ 95.00	\$ 9.50			Lauren Pyles	Client Relations Specialist
11/9/20	0.2	Prep work/ Prepare for	Sade Coker: 60 Min Phone Meeting	\$ 450.00	\$ 90.00			Penn Dodson	Partner
11/9/20	0.4	Telephone Call	Attorney Meets with PNC	\$ 450.00	\$ 180.00			Penn Dodson	Partner
11/9/20	0.1	Analysis/ Substantive Review	Fill out analysis checklist after PNC meeting	\$ 450.00	\$ 45.00			Penn Dodson	Partner
11/11/20	0.1	Admin - General Admin	JV Create Slack Channel & pin Clio Email link	\$ 125.00		\$ 12.50	0.1	Jess Velez	Paralegal
11/11/20	0.2	Admin - General Admin	JV Emailed Clio Matter vCard to Team added untrackable costs as flat fee amt as an Expense in Clio	\$ 125.00		\$ 25.00	0.2	Jess Velez	Paralegal
11/11/20	0.2	Admin - General Admin	Updating Clio matter	\$ 95.00		\$ 19.00	0.2	Lauren Pyles	Client Relations Specialist
11/11/20	0.5	Manage/Delegate/Assign	assign tasks since RA has been signed	\$ 450.00	\$ 225.00			Penn Dodson	Partner
11/12/20	0.2	Admin - General Admin	JV rvw'd letter to client re what to expect and corrected mistakes on letter to prepare for finalization	\$ 125.00	\$ 25.00			Jess Velez	Paralegal
11/12/20	0.7	Draft Demand Letter	JV reviewed the facts of the case, attorney's notes and began work on demand letter	\$ 125.00	\$ 87.50			Jess Velez	Paralegal
11/12/20	0.2	Prepare mailing/package	Mailing new client FAQ letter	\$ 95.00	\$ 19.00			Lauren Pyles	Client Relations Specialist
11/13/20	0.7	Draft Demand Letter	JV continued work on demand letter based on client intake and communication with team regarding claim	\$ 125.00	\$ 87.50			Jess Velez	Paralegal
11/16/20	0.1	Assemble / gather / collect documents together	JV communicated with client and began to collect additional documents in support of demand letter	\$ 125.00	\$ 12.50			Jess Velez	Paralegal
11/16/20	0.1	Read/review incoming email or correspondence	JV rvw'd em between PD and Client re her paycheck along w/ PD explanation of how reduced paychecks to salaried workers can and cannot be paid	\$ 125.00	\$ 12.50			Jess Velez	Paralegal
11/16/20	1	Draft Demand Letter	JV continued work on demand letter (wage demand and general demand - communicated with team on calcs and attempted to work out the numbers	\$ 125.00	\$ 125.00			Jess Velez	Paralegal
11/16/20	0.5	Substantive, High-Level Legal Document Drafting/Revisions	Draft demand letter(s)	\$ 450.00	\$ 225.00			Penn Dodson	Partner
11/17/20	0.4	Propound (Send, Email) Documents	JV sent EM to OC/OP with demand with wages attached	\$ 125.00	\$ 50.00			Jess Velez	Paralegal
11/17/20	1.3	Substantive, High-Level Legal Document Drafting/Revisions	Draft demand letter(s)	\$ 450.00	\$ 585.00			Penn Dodson	Partner
11/18/20	0.1	Manage/Delegate/Assign	JV tasked out assignments in regard to when OP's response to demand letter will be due and assigned self to check for response	\$ 125.00	\$ 12.50			Jess Velez	Paralegal
11/18/20	0.1	Manage/Delegate/Assign	JV managed and delegated tasks in regard to next steps such as updating client, updating CLIO with dates of letters sent, and follow up tasks for making sure next demand letter is ready to go	\$ 125.00	\$ 12.50			Jess Velez	Paralegal
12/1/20	0.1	Check Status	JV checked status of response- thus far, OP has not replied to demand by phone email or letter	\$ 125.00	\$ 12.50			Jess Velez	Paralegal
12/2/20	0.4	Proofread or Set Up Document	JV set up second demand letter to OC as a follow up to first letter due to no reply	\$ 125.00	\$ 50.00			Jess Velez	Paralegal

12/2/20	0.2	Draft Cover Letter	JV printed cover letter and supporting documents in preparation to mail out next demand	\$ 125.00	\$ 25.00			Jess Velez	Paralegal
12/2/20	0.1	Read/review incoming email or correspondence	JV rww'd corr from OP -- OP stating the demand should be directed to HR.	\$ 125.00	\$ 12.50			Jess Velez	Paralegal
12/2/20	0.1	Manage/Delegate/Assign	ck status, direct next steps	\$ 450.00	\$ 45.00			Penn Dodson	Partner
12/3/20	0.1	Read/review incoming email or correspondence	JV rww'd and replied to OP based on Attorney's instruction	\$ 125.00	\$ 12.50			Jess Velez	Paralegal
12/3/20	0.4	Draft Demand Letter	JV prepped and sent demand letter via email and mail	\$ 125.00	\$ 50.00			Jess Velez	Paralegal
12/10/20	0.1	Read/review incoming email or correspondence	Jv rww'd corr from client in regard to her fears in this case and updated tasks accordingly - to stay in touch with client and continue to see if OP would finally response substantively	\$ 125.00	\$ 12.50			Jess Velez	Paralegal
12/10/20	0.1	Compose/Send Email	EM to OP	\$ 450.00	\$ 45.00			Penn Dodson	Partner
12/14/20	0.1	Read/review incoming email or correspondence	JV rww'd corr generally, to understand why OP was so dismissive and what her motives are --- to delay?	\$ 125.00	\$ 12.50			Jess Velez	Paralegal
12/16/20	0.2	Manage/Delegate/Assign	JV rww'd pd corr in regard to getting OP's footage and proof and created a task to continue to follow up on tasks generally such as continuing to gather evidence and receiving a substantive response	\$ 125.00	\$ 25.00			Jess Velez	Paralegal
12/21/20	0.1	Check Status	JV checked to see if OC replied via mail or email/checked in with other admin to confirm or deny and updated tasks accordingly	\$ 125.00	\$ 12.50			Jess Velez	Paralegal
12/23/20	0.2	Compose/Send Email	JV sent nagging/ follow up email to OP. OP seems deceptive and like she is trying to delay...	\$ 125.00	\$ 25.00			Jess Velez	Paralegal
12/23/20	0.1	Compose/Send Email	JV checked in to see if OC intended to reply yet (via email)	\$ 195.00	\$ 19.50			Jess Velez	Paralegal
12/24/20	0.1	Read/review incoming email or correspondence	JV rww'd em to see of OC/OP replied and updated team as to lack a movement in the matter	\$ 125.00	\$ 12.50			Jess Velez	Paralegal
1/5/21	0.1	Admin - General Admin	Pulling tracking info on demand letter from USPS and saving into SP	\$ 95.00	\$ 9.50			Lauren Pyles	Client Relations Specialist
1/6/21	0.1	Check Status	JV Checked status of case generally. Follow up demand letter was delivered - JV let atty know when she last pinged OP for response	\$ 125.00	\$ 12.50			Jess Velez	Paralegal
1/8/21	1	Set Up Complaint	JV began drafting Complaint as directed by attorney	\$ 125.00	\$ 125.00			Jess Velez	Paralegal
1/21/21	0.1	Check Status	JV Checked in with team in regard to next steps and status of next steps	\$ 125.00	\$ 12.50			Jess Velez	Paralegal
1/27/21	0.2	Read/review incoming email or correspondence	JV communicated with client on how she should handle taxes do to her wrongful wage issues - directed question to attorney	\$ 125.00	\$ 25.00			Jess Velez	Paralegal
1/27/21	0.2	Communicate with Client	EM from/to clnt	\$ 450.00	\$ 90.00			Penn Dodson	Partner
1/28/21	0.8	Substantive, High-Level Legal Document Drafting/Revisions	Draft Cplt	\$ 450.00	\$ 360.00			Penn Dodson	Partner
1/29/21	0.8	Draft/Propound Standard/Form Letter	JV sent demand packet - printed out documents and cover letters - finalized documents and mailed out via email and regular mail	\$ 125.00	\$ 100.00			Jess Velez	Paralegal
2/3/21	0.1	Check Status	JV checked status of corr with OP to see if she will FINALLY reply, reviewed tasks to determine what is next and updated to do list	\$ 125.00	\$ 12.50			Jess Velez	Paralegal
2/17/21	0.1	Check Status	JV checked status of OP responding and checked in wiht attorney to determine next steps such as filing in court or dropping case	\$ 125.00	\$ 12.50			Jess Velez	Paralegal
2/17/21	0.2	Analysis/ Substantive Review	Evaluate for taking into court	\$ 450.00	\$ 90.00			Penn Dodson	Partner
2/22/21	0.2	Attorney Strat Planning or Discussion	Discuss w CTA whether to take case into court and/or next steps	\$ 450.00	\$ 90.00			Penn Dodson	Partner
2/23/21	0.2	Manage/Delegate/Assign	JV managed tasks and assigned to PD - tasks in regard to moving forward with case, discussing with client, gathering legal agreement signatures, etc	\$ 125.00	\$ 25.00			Jess Velez	Paralegal
2/23/21	0.1	Communicate with Client	EM to clnt	\$ 450.00	\$ 45.00			Penn Dodson	Partner
2/25/21	0.1	Periodic Case Review	Jv rww'd case wholistically to make sure we are geared up for next steps	\$ 125.00	\$ 12.50			Jess Velez	Paralegal
2/26/21	0.1	Check Status	JV checked status of call with Sade -- determined we will move forward w case and PD is asking for CL to pay filing fee	\$ 125.00	\$ 12.50			Jess Velez	Paralegal
2/26/21	0.2	Communicate with Client	Sade Coker: 30 Min Phone Meeting	\$ 450.00	\$ 90.00			Penn Dodson	Partner

3/1/21	0.1	Manage/Delegate/Assign	JV managed tasks in relation to legal services agreement, the filing fee, and our goal file by date	\$ 125.00	\$ 12.50			Jess Velez	Paralegal
3/2/21	0.1	Proofread or Set Up Document	JV prepared final cplt based on demand letter complaint, and sent to PD for edits	\$ 125.00	\$ 12.50			Jess Velez	Paralegal
3/2/21	0.4	ECF File Document	JV filed Cplt, Civil CS, and Summons	\$ 125.00	\$ 50.00			Jess Velez	Paralegal
3/2/21	0.8	Draft Civil Cover Sheet, Summons, Case Initiating Documents	JV set up civil CS and summons forms	\$ 195.00	\$ 156.00			Jess Velez	Paralegal
3/2/21	0.1	Substantive, High-Level Legal Document Drafting/Revisions	Edit Complaint	\$ 450.00	\$ 45.00			Penn Dodson	Partner
3/3/21	0.3	Download/File ECF Document	JV downloaded ECF DOX, saved into our filing system, and refiled summons as requested by clerk - updated tasks to reflect next steps	\$ 125.00	\$ 37.50			Jess Velez	Paralegal
3/3/21	0.1	Update System Contact Info		\$ 95.00		\$ 9.50	0.1	Lauren Pyles	Client Relations Specialist
3/4/21	0.2	Download/File ECF Document	JV ecf filed Summons as requested and updated tasks accordingly	\$ 125.00	\$ 25.00			Jess Velez	Paralegal
3/8/21	0.6	Serve Complaint (get it to process server; follow up til we get EOS'es back)	JV sent service packet to Staples and em'd process server to serve Ds	\$ 125.00	\$ 75.00			Jess Velez	Paralegal
3/8/21	0.2	Propound (Send, Email) Documents	Preparing, emailing, and mailing in-court FAQ	\$ 95.00	\$ 19.00			Lauren Pyles	Client Relations Specialist
3/10/21	0.2	Check Status	JV checked status of Judge Assignment and updated our system to reflect judge	\$ 125.00	\$ 25.00			Jess Velez	Paralegal
3/10/21	0.1	Update System Contact Info	Working on updating Clio related contacts, searching in SP DKT for judges assigned	\$ 95.00		\$ 9.50	0.1	Lauren Pyles	Client Relations Specialist
3/17/21	0.3	Call	JV spoke with process server in re Ds' evasion of service. Relayed to attorney, and returned call to process server to hash out plan for service	\$ 125.00	\$ 37.50			Jess Velez	Paralegal
3/17/21	0.1	Update System Contact Info		\$ 95.00		\$ 9.50	0.1	Lauren Pyles	Client Relations Specialist
3/31/21	0.2	Read/review incoming email or correspondence	JV read corr with server re next step's plan to serve OP - OP continues to be difficult to serve and is evading service	\$ 125.00	\$ 25.00			Jess Velez	Paralegal
3/31/21	0.1	Call	JV call w Process Server to discuss over all plan of service	\$ 125.00	\$ 12.50			Jess Velez	Paralegal
4/2/21	1.2	Set Up/Draft Motion	JV set up Mtn for Substitute Service y Fees/Costs w/ statements as directed by attorney	\$ 125.00	\$ 150.00			Jess Velez	Paralegal
4/3/21	0.1	Communicate with Client	EM to clnt re alt address for svc	\$ 450.00	\$ 45.00			Penn Dodson	Partner
4/5/21	0.3	Serve Complaint (get it to process server; follow up til we get EOS'es back)	JV worked on getting Julie Goldberg served - based on information from client and attorney's direction, slightly shifted approach to service - calendared and tasked out the plan	\$ 125.00	\$ 37.50			Jess Velez	Paralegal
4/13/21	0.3	Call	JV spoke with OC Brian Lehman and set up call for PD and OC to discuss waiver of service and his potential motion to dismiss	\$ 125.00	\$ 37.50			Jess Velez	Paralegal
4/14/21	0.5	Telephone Call	Bryan Lehman: Phone Meeting + FU EM to him	\$ 450.00	\$ 225.00			Penn Dodson	Partner
4/15/21	0.1	Check Status	JV checked status of service - compared process server's pending notes with our attorney to see if service was completed or if D finally hired attorney.	\$ 125.00	\$ 12.50			Jess Velez	Paralegal
4/19/21	0.4	Calendar & Task Out All Deadlines/ Appearances/ Dates From Scheduling Order/CMO/TMO	JV calendared y tasked out deadlines related to Answer, response deadlines and initial case management	\$ 125.00	\$ 50.00			Jess Velez	Paralegal
4/20/21	0.3	Read/review incoming email or correspondence	JV rvw'd Ds' pre-mtn letter and set up Response to letter - passed to attorney for review - Discussed with atty next steps such as stip to answer	\$ 125.00	\$ 37.50			Jess Velez	Paralegal
4/20/21	0.1	Check Status	JV read corr re OC's letter and PD's instruction for next steps	\$ 125.00	\$ 12.50			Jess Velez	Paralegal
4/21/21	0.1	Read/review incoming email or correspondence	JV read PD's corr with OC re retaliation - caselaw 2nd cir "Greathouse"	\$ 125.00	\$ 12.50			Jess Velez	Paralegal

4/21/21	1.1	Read/review incoming email or correspondence	Read and Resp to OC's Pre-Mtn letter	\$ 450.00	\$ 495.00			Penn Dodson	Partner
4/22/21	0.1	Read/review incoming email or correspondence	JV read corr re whether we are still planning to stip to answer date (OC complicated this a bit)	\$ 125.00	\$ 12.50			Jess Velez	Paralegal
4/22/21	0.4	Proofread or Set Up Document	JV set up stipulation to answer date based on attorney's direction and finalized for review	\$ 125.00	\$ 50.00			Jess Velez	Paralegal
4/26/21	0.1	Call	JV spoke with process server in re our attempts to serve and continuing plan for service	\$ 125.00	\$ 12.50			Jess Velez	Paralegal
4/26/21	0.2	Compose/Send Email	EM to OC re Side Issue	\$ 450.00	\$ 90.00			Penn Dodson	Partner
4/27/21	0.1	Read/review incoming email or correspondence	JV read corr with PD and OC re his lack of bar membership and lack of URL to live website...	\$ 125.00	\$ 12.50			Jess Velez	Paralegal
4/28/21	0.2	Serve Complaint (get it to process server; follow up til we get EOS'es back)	JV read corr re service - requested digital copies of affidavits of service for our records and filing with court	\$ 125.00	\$ 25.00			Jess Velez	Paralegal
4/28/21	0.2	Compose/Send Email	EMs to & from oc	\$ 450.00	\$ 90.00			Penn Dodson	Partner
4/30/21	0.3	Set Up/Draft Motion	JV Set up response to Ds' letter mtn to dismiss	\$ 125.00	\$ 37.50			Jess Velez	Paralegal
5/4/21	0.2	Manage/Delegate/Assign	JV managed y delegated tasks in regard to calendaring responses and making sure we meet appropriate response deadlines	\$ 125.00	\$ 25.00			Jess Velez	Paralegal
5/4/21	0.1	Compose/Send Email	OC to File Pre-Mtn Ltr by 5-3 - EM OC to check status on htis	\$ 450.00	\$ 45.00			Penn Dodson	Partner
5/6/21	0.3	Research	SOH research	\$ 450.00	\$ 135.00			Penn Dodson	Partner
5/7/21	0.1	Download/File ECF Document	JV dl'd dkt y filed in SP -- Rvw'd D's pre mtn letter	\$ 125.00	\$ 12.50			Jess Velez	Paralegal
5/7/21	0.1	Read/review incoming email or correspondence	JV read corr c	\$ 125.00	\$ 12.50			Jess Velez	Paralegal
5/7/21	0.2	Read/review incoming email or correspondence	JV read corr	\$ 125.00	\$ 25.00			Jess Velez	Paralegal
5/7/21	0.2	Calendar & Task Out All Deadlines/ Appearances/ Dates From Scheduling Order/CMO/TMO	JV calendared y tasked out deadlines - double checked deadlines and calendar - made sure we are on task in accordance with judge rules	\$ 125.00	\$ 25.00			Jess Velez	Paralegal
5/7/21	0.7	Read/review incoming email or correspondence	Rvw dkt 9	\$ 450.00	\$ 315.00			Penn Dodson	Partner
5/17/21	0.4	Calendar & Task Out All Deadlines/ Appearances/ Dates From Scheduling Order/CMO/TMO	JV tasked out deadlines in regard to order for mediation and rules of FLSA pilot program	\$ 125.00	\$ 50.00			Jess Velez	Paralegal
5/17/21	0.2	Compose/Send Email	EM OC re Mediators (assign date 5/27)	\$ 450.00	\$ 90.00			Penn Dodson	Partner
5/18/21	0.4	Read/review incoming email or correspondence	JV read corr re mediation and next steps to take- compared with self assigned tasks to ensure accuracy	\$ 125.00	\$ 50.00			Jess Velez	Paralegal
5/18/21	0.2	Periodic Case Review	jv rvw'd case generally	\$ 125.00	\$ 25.00			Jess Velez	Paralegal
5/19/21	0.2	Read/review incoming email or correspondence	JV read corr from mediator and assigned PD to review	\$ 125.00	\$ 25.00			Jess Velez	Paralegal
5/20/21	0.2	Read/review incoming email or correspondence	JV read corr re mediation and mediators preference to wait until MTD is decided	\$ 125.00	\$ 25.00			Jess Velez	Paralegal
5/20/21	0.1	Read/review incoming email or correspondence	JV read corr re mediation postponement and communicated with attorney re our thoughts..	\$ 125.00	\$ 12.50			Jess Velez	Paralegal
5/20/21	0.4	Edit Document	respond to OC's ltr to judge re premotion conf re MTD (due 5/27)	\$ 450.00	\$ 180.00			Penn Dodson	Partner
5/20/21	0.1	Read/review incoming email or correspondence	Rvw Mediation Ltr	\$ 450.00	\$ 45.00			Penn Dodson	Partner
5/22/21	0.4	Obtain/Secure Signature (RA/SA/Decl/Aff)	JV sent mediation agreement doc out for signatures	\$ 125.00	\$ 50.00			Jess Velez	Paralegal
5/22/21	0.3	ECF File Document	JV ECF filed P's Resp to Ds' MTD	\$ 125.00	\$ 37.50			Jess Velez	Paralegal
5/25/21	0.1	Obtain/Secure Signature (RA/SA/Decl/Aff)	JV circulated mediation document for signatures	\$ 125.00	\$ 12.50			Jess Velez	Paralegal

5/26/21	0.3	Download/File ECF Document	JV filed ECF dkt and reviewed calendars - caught scheduling conflict and ran by attorney	\$ 125.00	\$ 37.50			Jess Velez	Paralegal
5/26/21	0.1	Download/File ECF Document	JV downloaded ecf dkt in re to rescheduling notice	\$ 125.00	\$ 12.50			Jess Velez	Paralegal
5/26/21	0.1	Manage/Delegate/Assign	JV managed tasks y delegated out tasks in regard to rescheduling notice - updated calendars	\$ 125.00	\$ 12.50			Jess Velez	Paralegal
5/27/21	0.2	Prep Court Appearance Form	JV prepped CAF for upcoming court meeting- passed to attorney	\$ 125.00	\$ 25.00			Jess Velez	Paralegal
5/31/21	0.1	Check Status	check status generally	\$ 450.00	\$ 45.00			Penn Dodson	Partner
6/3/21	0.1	Call	JV spoke with client re what to expect in the case generally and logged details of call in clilo	\$ 125.00	\$ 12.50			Jess Velez	Paralegal
6/3/21	0.2	Prep work/ Prepare for	CAF for 6/4 pre motion conf	\$ 450.00	\$ 90.00			Penn Dodson	Partner
6/4/21	0.5	Calendar & Task Out All Deadlines/ Appearances/ Dates From Scheduling Order/CMO/TMO	JV calendared y tasked out deadlines after 6/4 court appearance - tasked out in relation to MTD and then attending mediation if MTD is not successful. also tasked out conferral requirements in re exchange of existing documents	\$ 125.00	\$ 62.50			Jess Velez	Paralegal
6/4/21	0.1	Read/review incoming email or correspondence	JV read minute entry from court and compared to PD's upshot and tasked out directions - triple confirmed everything is correct and accurate	\$ 125.00	\$ 12.50			Jess Velez	Paralegal
6/4/21	0.3	Attend Court	Review dox before, attend pre motion conf, task out after	\$ 450.00	\$ 135.00			Penn Dodson	Partner
6/6/21	0.1	Read/review incoming email or correspondence	JV read email re OC signature on SDNY mediatio form	\$ 125.00	\$ 12.50			Jess Velez	Paralegal
6/7/21	0.2	Call	JV spoke with CL re status of case - gave quick update and let her know this can take a very long time or settle any minute (though that seems unlikely)	\$ 125.00	\$ 25.00			Jess Velez	Paralegal
6/7/21	0.1	Check Status	JV checked status of case - in re plan to amend complaint and also determine dates for mediation	\$ 125.00	\$ 12.50			Jess Velez	Paralegal
6/7/21	0.1	Read/review incoming email or correspondence	JV read corr mediation and attempted to coordinate date that works with attorney schedule and mediator	\$ 125.00	\$ 12.50			Jess Velez	Paralegal
6/10/21	0.2	Book appointment/ schedule meeting (incl. reserving space etc. if applicable)	JV worked on coordinating meeting for mediation - corr with all parties to determine best date	\$ 125.00	\$ 25.00			Jess Velez	Paralegal
6/11/21	0.2	Read/review incoming email or correspondence	JV read corr and requested mediation confirmation email + details - confirmed it is coming	\$ 125.00	\$ 25.00			Jess Velez	Paralegal
6/11/21	0.1	Manage/Delegate/Assign	JV managed y delegated tasks in relation to mediation	\$ 125.00	\$ 12.50			Jess Velez	Paralegal
6/11/21	0.1	Read/review incoming email or correspondence	JV read additional correspondence in regard to mediation and what to expect in the pilot program	\$ 125.00	\$ 12.50			Jess Velez	Paralegal
6/14/21	0.3	Propound (Send, Email) Documents	JV drafted a letter to client on "what to expect during mediation" - sent to client via email	\$ 125.00	\$ 37.50			Jess Velez	Paralegal
6/14/21	0.1	Read/review incoming email or correspondence	jv read corr - answered client's questions re mediation	\$ 125.00	\$ 12.50			Jess Velez	Paralegal
6/14/21	0.3	Substantive, High-Level Legal Document Drafting/Revisions	Deadline to Confer & Produce	\$ 450.00	\$ 135.00			Penn Dodson	Partner
6/15/21	0.3	Research Procedural/Judge Rule	JV looked into dkt and tried to understand the overall procedure - once mediation happens then we will continue case (pick up from MTD, so potentially an answer to cplt then case management???)	\$ 125.00	\$ 37.50			Jess Velez	Paralegal
6/15/21	0.2	Draft document (other)	JV drafted notice of mediation and passed to pd for rww	\$ 125.00	\$ 25.00			Jess Velez	Paralegal
6/15/21	0.2	ECF File Document	JV ECF filed Notice of Mediation	\$ 125.00	\$ 25.00			Jess Velez	Paralegal
6/17/21	0.1	Download/File ECF Document	JV downloaded y filed ecf dkt - saved to records and marked task as done -	\$ 125.00	\$ 12.50			Jess Velez	Paralegal
6/22/21	0.3	Calendar Deadlines/ Appearances/ Dates	JV tasked out deadlines based on the approved proposed briefing schedule for motion to dismiss	\$ 125.00	\$ 37.50			Jess Velez	Paralegal
6/22/21	0.4	Telephone Call	Call w OC brian; FU EM to him re game plan	\$ 450.00	\$ 180.00			Penn Dodson	Partner
6/27/21	0.3	Set Up/Draft Letter	JV set up RULE 11 safe harbour letter to OC	\$ 125.00	\$ 37.50			Jess Velez	Paralegal
6/28/21	0.2	Compose/Send Email	JV emailed client in regard to next steps and overall plan	\$ 125.00	\$ 25.00			Jess Velez	Paralegal

6/28/21	0.3	Manage/Delegate/Assign	JV managed tasks y delegated out - specifically in re to safe harbour rule and setting up SOF for zoom mediation	\$ 125.00	\$ 37.50			Jess Velez	Paralegal
6/29/21	0.2	Read/review incoming email or correspondence	JV rvw'd file provided by client and compared to statement	\$ 125.00	\$ 25.00			Jess Velez	Paralegal
6/30/21	0.9	Set Up/Draft Letter	JV worked on SOF for OC - compiled documents to produce - as required for mediation	\$ 125.00	\$ 112.50			Jess Velez	Paralegal
6/30/21	1.3	Set Up/Draft Letter	JV continued work on SOF for mediation - based on CL and compared to mediation deadline requirements	\$ 125.00	\$ 162.50			Jess Velez	Paralegal
6/30/21	0.4	Set Up/Draft Letter	JV further edited SOF	\$ 125.00	\$ 50.00			Jess Velez	Paralegal
6/30/21	0.2	Compose/Send Email	JV emailed client re SOF and documents for her statement	\$ 125.00	\$ 25.00			Jess Velez	Paralegal
7/1/21	0.1	Manage/Delegate/Assign	JV managed tasks- made sure we are up to date in regard to all deadlines - cleaned up tasks for clarity	\$ 125.00	\$ 12.50			Jess Velez	Paralegal
7/1/21	0.8	Substantive, High-Level Legal Document Drafting/Revisions	Revise SOF	\$ 450.00	\$ 360.00			Penn Dodson	Partner
7/2/21	0.2	Draft/Propound Standard/Form Letter	JV sent confidential settlement letter to OC via email including the Statement of Facts	\$ 125.00	\$ 25.00			Jess Velez	Paralegal
7/6/21	0.3	Read/review incoming email or correspondence	CL sent a ltr from HR with annotations, JV reviewed letter and passed to PD	\$ 125.00	\$ 37.50			Jess Velez	Paralegal
7/6/21	0.2	Ensure doc/item expected back is received (track, nag)	JV saw that OC did not send his SOF - nagged for document return -	\$ 125.00	\$ 25.00			Jess Velez	Paralegal
7/6/21	0.1	Call	JV called OC - determined that he will get SOF to us by tomorrow	\$ 125.00	\$ 12.50			Jess Velez	Paralegal
7/7/21	0.1	Manage/Delegate/Assign	JV managed tasks by comparing them to our deadlines calendar and projected timeline, updated tasks and delegated as needed	\$ 125.00	\$ 12.50			Jess Velez	Paralegal
7/8/21	0.2	Manage/Delegate/Assign	JV managed tasks in relation to mediation and the preparation of discovery- passed to PD to review and edit/approve	\$ 125.00	\$ 25.00			Jess Velez	Paralegal
7/9/21	1.1	Research	Prep for mediation	\$ 450.00	\$ 495.00			Penn Dodson	Partner
7/11/21	0.2	Prep work/ Prepare for	JV prepared documents for mediation such as mediation term sheet and court appearance form	\$ 125.00	\$ 25.00			Jess Velez	Paralegal
7/12/21	0.8	Prep work/ Prepare for	JV prepared exhibits for ex parte mediation statement	\$ 125.00	\$ 100.00			Jess Velez	Paralegal
7/12/21	0.2	Propound (Send, Email) Documents	JV sent ex parte letter to mediator with exhibits	\$ 125.00	\$ 25.00			Jess Velez	Paralegal
7/12/21	1.6	Edit Document	draft ex parte ltr, flesh out case resarch summaries	\$ 450.00	\$ 720.00			Penn Dodson	Partner
7/12/21	0.9	Prep work/ Prepare for	Prep for mediation. Call w OC. More work on ltr to mediator. 2 EMs to OC, re legal authority + atty fees.	\$ 450.00	\$ 405.00			Penn Dodson	Partner
7/13/21	0.3	Prep work/ Prepare for	JV prepped Notice of Appearance and tried to file under attorney CTAs name.	\$ 125.00	\$ 37.50			Jess Velez	Paralegal
7/13/21	0.1	Download/File ECF Document	JV downloaded y filed ecf dkt - saved to file	\$ 125.00	\$ 12.50			Jess Velez	Paralegal
7/13/21	0.4	Prep work/ Prepare for	JV prepared Client, tasks, and DOX for mediation	\$ 125.00	\$ 50.00			Jess Velez	Paralegal
7/14/21	0.3	Prep work/ Prepare for	Mediation Prep	\$ 475.00	\$ 142.50			Christopher Anderson	Partner
7/14/21	0.2	Prep work/ Prepare for	CAF - review in prep for mediation	\$ 450.00	\$ 90.00			Penn Dodson	Partner
7/16/21	1.7	L160 Settlement/Non-Binding ADR	Prep for and attend mediation.	\$ 475.00	\$ 807.50			Christopher Anderson	Partner
7/16/21	1.9	L160 Settlement/Non-Binding ADR	Prep for/have mandatory sdny mediation, by zoom. After, draft ltr to OC to set up rule 11 motion if he goes fwd w MTD. Set up ltr to judge to give report w/in 48 hours of mediation as ordered. EM it to OC.	\$ 450.00	\$ 855.00			Penn Dodson	Partner
7/19/21	0.1	Download/File ECF Document	JV filed mediation report in case file	\$ 125.00	\$ 12.50			Jess Velez	Paralegal
7/20/21	0.4	Calendar Deadlines/ Appearances/ Dates	JV checked status of case- determined briefing schedule, compared to our deadlines calendar	\$ 195.00	\$ 78.00			Jess Velez	Paralegal
7/24/21	0.1		Review Dkt 18	\$ 450.00	\$ 45.00			Penn Dodson	Partner
7/28/21	0.2	Read/review incoming email or correspondence	JV read corr generally and made sure the team is updated on what to expect next in regard to filings	\$ 125.00	\$ 25.00			Jess Velez	Paralegal
7/29/21	0.5	Set Up/Draft Motion	JV set up Rule 11 motion as directed by attorney	\$ 125.00	\$ 62.50			Jess Velez	Paralegal

7/30/21	0.2	Download/File ECF Document	JV filed Ds' mtd to our system and passed to PD for rww	\$ 125.00	\$ 25.00			Jess Velez	Paralegal
7/31/21	0.5	Proofread or Set Up Document	JV set up R11 Mtn y supporting dox such a letter to OC	\$ 125.00	\$ 62.50			Jess Velez	Paralegal
8/2/21	1.5	Proofread or Set Up Document	JV proofed safe harbour and filled in blanks	\$ 125.00	\$ 187.50			Jess Velez	Paralegal
8/2/21	2.8	Edit Document	Edit R11 Motion	\$ 450.00	\$ 1,260.00			Penn Dodson	Partner
8/3/21	0.1	Read/review incoming email or correspondence	JV read corr between pd and oc re safe harbour	\$ 125.00	\$ 12.50			Jess Velez	Paralegal
8/4/21	0.2	Set Up/Draft Motion	JV set up resp to mtn to dismiss	\$ 125.00	\$ 25.00			Jess Velez	Paralegal
8/4/21	0.4	Set Up/Draft Motion	JV continued work on response to mtn to dismiss	\$ 125.00	\$ 50.00			Jess Velez	Paralegal
8/4/21	0.1	Manage/Delegate/Assign	JV managed tasks and delegated to both attorneys based on PD instruction -- set internal deadlines to finalize the mtn	\$ 125.00	\$ 12.50			Jess Velez	Paralegal
8/4/21	0.1	Manage/Delegate/Assign	delegate MTD resp drafting to GC	\$ 450.00	\$ 45.00			Penn Dodson	Partner
8/5/21	0.2	Read/review incoming email or correspondence	JV read ecf bounce and tasked PD to review: Ds letter mtn for order enjoining p's counsel	\$ 125.00	\$ 25.00			Jess Velez	Paralegal
8/5/21	0.2	Read/review incoming email or correspondence	JV read PD ltr to judge	\$ 125.00	\$ 25.00			Jess Velez	Paralegal
8/5/21	1	Substantive, High-Level Legal Document Drafting/Revisions	review/respond to ltr motion re enjoining us from stuff we werent intending to do	\$ 450.00	\$ 450.00			Penn Dodson	Partner
8/6/21	0.1	Review ECF bounce	Rww Dkt 23	\$ 450.00	\$ 45.00			Penn Dodson	Partner
8/10/21	0.2	Read/review incoming email or correspondence	JV read corr from supervising attorney in re to MTD - let attorney know deadline to file	\$ 125.00	\$ 25.00			Jess Velez	Paralegal
8/10/21	2.3		Continue working on response to Motion to Dismiss; perform research re: supplemental jurisdiction; perform research re: classification of personal assistants.	\$ 400.00	\$ 920.00			Maria-Vittoria ("Giugi") Carminati	Associate
8/11/21	1.1	Substantive, High-Level Legal Document Drafting/Revisions	work on MTD resp	\$ 450.00	\$ 495.00			Penn Dodson	Partner
8/12/21	0.1	Check Status	JV checked status	\$ 125.00	\$ 12.50			Jess Velez	Paralegal
8/12/21	0.1	Read/review incoming email or correspondence	JV read corr- updated attorneys and reminded them re the mtd resp	\$ 125.00	\$ 12.50			Jess Velez	Paralegal
8/12/21	0.4	Download/File ECF Document	JV filed dkt into SP and read filings : P's resp to MTD	\$ 125.00	\$ 50.00			Jess Velez	Paralegal
8/12/21	0.8	Substantive, High-Level Legal Document Drafting/Revisions	revise MTD resp	\$ 450.00	\$ 360.00			Penn Dodson	Partner
8/24/21	0.2	Analysis/ Substantive Review	If MTD not withdrawn, can file R11 Motion. Decision?	\$ 450.00	\$ 90.00			Penn Dodson	Partner
8/25/21	0.4	Download/File ECF Document	JV filed dkt into SP and read filings : MTN FOR SANCTIONS - and copy of safe harbour letter	\$ 125.00	\$ 50.00			Jess Velez	Paralegal
8/27/21	0.2	Download/File ECF Document	JV downloaded dkts, shared and rww'd -	\$ 125.00	\$ 25.00			Jess Velez	Paralegal
8/27/21	0.2	Set Up/Draft Letter	JV set up letter to judge at attorneys request	\$ 125.00	\$ 25.00			Jess Velez	Paralegal
8/30/21	0.3	ECF File Document	JV filed ecf dkt; Mea Culpa letter - saved dkt to casefile	\$ 125.00	\$ 37.50			Jess Velez	Paralegal
8/30/21	0.2	Calendar Deadlines/ Appearances/ Dates	JV calendared and tasked out deadlines based on judge order dkt 31	\$ 125.00	\$ 25.00			Jess Velez	Paralegal
8/30/21	0.8	Substantive, High-Level Legal Document Drafting/Revisions	ltr to judge	\$ 450.00	\$ 360.00			Penn Dodson	Partner
8/30/21	0.1	Review ECF bounce	Ds Reply to Ps resp to Ds MTD 8/27	\$ 450.00	\$ 45.00			Penn Dodson	Partner
9/2/21	0.2	Analysis/ Substantive Review	Review Defendant's Letter response to letter Motion to Dismiss.	\$ 475.00	\$ 95.00			Christopher Anderson	Partner
9/2/21	0.2	Manage/Delegate/Assign	JV managed tasks based on Ds' Resp to P's Mtn for Pre Mtn Conf	\$ 125.00	\$ 25.00			Jess Velez	Paralegal
9/2/21	0.1	Read/review incoming email or correspondence	JV read corr OC and PD	\$ 125.00	\$ 12.50			Jess Velez	Paralegal
9/7/21	0.2	Prep Court Appearance Form	JV prepped Court appearance form re r11 mtn hearing and mtd -- status conference	\$ 125.00	\$ 25.00			Jess Velez	Paralegal
9/8/21	0.1	Read/review incoming email or correspondence	JV read corr	\$ 125.00	\$ 12.50			Jess Velez	Paralegal
9/8/21	0.5	Attend Court	Pre Mtn Conf re prp Rule 11 Motn - prep for & attend	\$ 450.00	\$ 225.00			Penn Dodson	Partner

12/12/21	0.1	Check Status	Check status of case generally	\$ 450.00	\$ 45.00			Penn Dodson	Partner
12/29/21	0.2	Telephone Call	Called court re MTD	\$ 175.00	\$ 35.00			Frankie Brown	Paralegal
12/29/21	0.2	Analysis/ Substantive Review	Reviewed case status	\$ 175.00	\$ 35.00			Frankie Brown	Paralegal
1/3/22	0.1	Periodic Case Review	Check status of case generally, ensure future tasks are appropriate	\$ 450.00	\$ 45.00			Penn Dodson	Partner
1/28/22	0.1	Periodic Case Review	Status check of case/case review with team	\$ 175.00	\$ 17.50			Frankie Brown	Paralegal
2/16/22	0.2	Compose/Send Email	JV emailed client to give her an update (we are waiting on ruling for MTD)	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
2/26/22	0.1	Periodic Case Review	Check status generally, ensure tasks are on course	\$ 450.00	\$ 45.00			Penn Dodson	Partner
3/4/22	0.1	Periodic Case Review	Periodic case review with team	\$ 175.00		\$ 17.50	0.1	Frankie Brown	Paralegal
3/8/22	0.2	Manage/Delegate/Assign	JV managed tasks y delegated out -- checked generally for update on next steps... still waiting to MTD ruling	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
3/23/22	0.2	Compose/Send Email	JV reviewed case and emailed client again no update	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
3/24/22	0.1	Download/File ECF Document	JV downloaded y filed ecf dkt - Order re MTD - tasked PD to review	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
3/24/22	0.4	Review ECF bounce	Review MTD order, EM client	\$ 450.00	\$ 180.00			Penn Dodson	Partner
3/27/22	0.2	Calendar Deadlines/ Appearances/ Dates	JV calendared appearance and deadlines based on surviving mtd	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
3/29/22	0.1	Manage/Delegate/Assign	JV managed tasks y delegated out in anticipation of answer and our next steps	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
4/14/22	0.3	Download/File ECF Document	Processed in DKT 35 filing/ updated deadlines in Asana and outlook/slacked team with update	\$ 175.00	\$ 52.50			Tara Hodges	Paralegal
4/15/22	0.1	Read/review incoming email or correspondence	JV read and reviewed corr re new oc	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
4/22/22	1	Admin - General Admin	Annotate Complaint	\$ 95.00	\$ 95.00			Callyn Carter	Paralegal
4/25/22	0.2	Compose/Send Email	JV emailed/updated client as to next steps of the case	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
4/26/22	0.2	Draft Initial Disclosures	JV set up initial disclosures and passed to attorney for review	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
4/27/22	0.3	Check Status	JV checked status of case generally to make sure we're on track - complaint annotated and that we are meeting our internal deadlines	\$ 175.00	\$ 52.50			Jess Velez	Paralegal
4/27/22	0.2	Research Procedural/Judge Rule	JV rww'd judge rules	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
4/27/22	0.4	Draft document (other)	JV set up case management order	\$ 175.00	\$ 70.00			Jess Velez	Paralegal
4/27/22	0.4	Set Up/Draft Motion	JV continued to set up initial disclosures based on instruction	\$ 175.00	\$ 70.00			Jess Velez	Paralegal
4/28/22	0.2	Prep Court Appearance Form	JV prepped court appearance form for case management hearing	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
5/4/22	0.2	Manage/Delegate/Assign	JV managed tasks based on Joint proposed management plan and meeting/conf.	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
5/4/22	0.4	ECF File Document	JV finalized CMO and filed... then updated CAF	\$ 175.00	\$ 70.00			Jess Velez	Paralegal
5/4/22	0.1	Compose/Send Email	EM OC prp sched order	\$ 450.00	\$ 45.00			Penn Dodson	Partner
5/5/22	0.1	Read/review incoming email or correspondence	JV read corr - determined next steps based on status conf and case management plan	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
5/5/22	0.3	Attend Court	Coker: Status Conference (incl prep / review before)	\$ 450.00	\$ 135.00			Penn Dodson	Partner
5/6/22	0.2	Propound (Send, Email) Documents	JV sent out initial disclosures to D and updated case management software to reflect date	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
5/12/22	0.7	Calendar & Task Out All Deadlines/ Appearances/ Dates From Scheduling Order/CMO/TMO	JV tasked out deadlines and appearances from proposed scheduling order	\$ 175.00	\$ 122.50			Jess Velez	Paralegal
5/17/22	0.3	Calendar & Task Out All Deadlines/ Appearances/ Dates From Scheduling Order/CMO/TMO	JV tasked out official scheduling order and made it matched tasks and dates already added to software	\$ 175.00	\$ 52.50			Jess Velez	Paralegal
5/17/22	0.3	Manage/Delegate/Assign	JV managed tasks	\$ 175.00	\$ 52.50			Jess Velez	Paralegal
5/18/22	1	Admin - General Admin	Draft disc requests	\$ 95.00	\$ 95.00			Callyn Carter	Paralegal
5/23/22	0.3	Admin - General Admin	Make edits to disc requests/Pass to PD	\$ 95.00	\$ 28.50			Callyn Carter	Paralegal
5/23/22	0.2	Proofread or Set Up Document	JV proofed discovery requests	\$ 175.00	\$ 35.00			Jess Velez	Paralegal

6/1/22	0.2	Read/review incoming email or correspondence	jv reviewed minute order and updated where necessary	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
6/1/22	0.1	Manage/Delegate/Assign	JV managed tasks y delegated out	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
6/6/22	0.3	Read/review incoming email or correspondence	JV read and reviewed corr- email from OC/ initial disc and supporting docs	\$ 175.00	\$ 52.50			Jess Velez	Paralegal
6/23/22	0.4	Manage/Delegate/Assign	JV managed tasks in relation to D's r68 offer - updated deadlines and reviewed the rules... tasked out steps such as pd comm w client and resp by deadline	\$ 175.00	\$ 70.00			Jess Velez	Paralegal
6/24/22	0.2	Read/review incoming email or correspondence	JV read and reviewed corr in re to rule 68 response and updated tasks accordingly	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
7/7/22	0.4	Propound (Send, Email) Documents	JV sent discovery requests to OC (rogs rpd's etc)	\$ 175.00	\$ 70.00			Jess Velez	Paralegal
7/7/22	0.3	Manage/Delegate/Assign	JV managed tasks re: deadline to d to resp to disc requests and updated calendars to reflect	\$ 175.00	\$ 52.50			Jess Velez	Paralegal
7/7/22	0.5	ZZZ-Needs SKU	Review/revise discovery requests, then pass back for propounding	\$ 450.00	\$ 225.00			Penn Dodson	Partner
7/7/22	3.5	Edit Document	Edit Pre-Mediation Letter to OC and select Documents for exchange [due 7/7]	\$ 450.00	\$ 1,575.00			Penn Dodson	Partner
7/22/22	0.1	Periodic Case Review	Periodic Case Review - Made sure we are meeting internal deadlines, that our progress in relation to close of disc. is appropriate and there are no unattended tasks	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
7/27/22	0.1	Read/review incoming email or correspondence	JV read corr re Ds' request for ext to produce disc responses	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
7/27/22	0.1	Compose/Send Email	Subject: Coker v. Goldberg & Associates P.C. No 21 Civ. 01803	\$ 450.00	\$ 45.00			Penn Dodson	Partner
8/8/22	0.2	Read/review incoming email or correspondence	JV read corr - processed in Ds' disc req. to P	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
8/9/22	0.4	Manage/Delegate/Assign	JV read corr re Ds' corrected disc requests and updated tasks/ deadlines to reflect our responses. delegated set up and editing of responses	\$ 195.00	\$ 78.00			Jess Velez	Paralegal
8/9/22	0.1	Compose/Send Email	receive rogs/RPDs, direct team to start response setup	\$ 450.00	\$ 45.00			Penn Dodson	Partner
8/10/22	0.8	Draft discovery responses (incl getting info from client) RPDs Rofs RFAs	JV set up discovery responses based on atty instruction	\$ 175.00	\$ 140.00			Jess Velez	Paralegal
8/15/22	1	Admin - General Admin	Organize cdox/Add to TOC	\$ 95.00	\$ 95.00			Callyn Carter	Paralegal
8/21/22	0.3	Manage/Delegate/Assign	JV managed tasks y delegated out in relation to finalizing discovery responses	\$ 175.00	\$ 52.50			Jess Velez	Paralegal
8/21/22	0.4	Analysis/ Substantive Review	Review Ds RPDs & rogs, add objections & comments for para to collect info	\$ 450.00	\$ 180.00			Penn Dodson	Partner
8/22/22	2	Admin - General Admin	Organize ddox/Add to sheet/Bates	\$ 95.00	\$ 190.00			Callyn Carter	Paralegal
8/23/22	0.1	Check Status	JV checked status of case - notified attorney she needs to Review Ds' disc responses and checked in on need for depositions and or Meet/confer letter	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
8/23/22	1.4	Draft discovery responses (incl getting info from client) RPDs Rofs RFAs	JV worked on discovery responses, called and emailed client re disc questions and worked to finalize our responses	\$ 175.00	\$ 245.00			Jess Velez	Paralegal
8/23/22	0.4	Compose/Send Email	JV emailed client re document requests	\$ 175.00	\$ 70.00			Jess Velez	Paralegal
8/23/22	0.6	Draft discovery responses (incl getting info from client) RPDs Rofs RFAs	JV worked on disc requests	\$ 175.00	\$ 105.00			Jess Velez	Paralegal
8/24/22	2	Admin - General Admin	Adding additional DDox	\$ 95.00	\$ 190.00			Callyn Carter	Paralegal
8/24/22	0.3	Read/review incoming email or correspondence	JV read corr with client re her discover responses	\$ 175.00	\$ 52.50			Jess Velez	Paralegal
8/25/22	0.1	Read/review incoming email or correspondence	JV read corr with cl - cont. disc re disc responses	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
8/29/22	0.7	Analysis/ Substantive Review	Review D's disc resps, start meet & confer letter for JV to work on	\$ 450.00	\$ 315.00			Penn Dodson	Partner

8/30/22	0.1	Read/review incoming email or correspondence	JV read corr between OC and PD re meet and confer letter	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
8/30/22	0.3	Draft discovery responses (incl getting info from client) RPDs Rgs RFAs	JV worked on P's discovery responses	\$ 175.00	\$ 52.50			Jess Velez	Paralegal
8/30/22	1.5	Draft discovery responses (incl getting info from client) RPDs Rgs RFAs	JV continued work on P's discovery responses based on all information rcv'd from client -- owrk on polishing responses and adding objections	\$ 175.00	\$ 262.50			Jess Velez	Paralegal
8/30/22	0.2	Manage/Delegate/Assign	JV managed tasks generally and made sure we are still meeting deadlines, esp in light of meet and confer on disc deficiency	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
8/31/22	0.9	Set Up/Draft Letter	JV worked on discovery letter - meet and confer re disc deficiency	\$ 175.00	\$ 157.50			Jess Velez	Paralegal
8/31/22	0.7	Set Up/Draft Letter	JV continued to work out details on meet and confer letter re disc deficiency	\$ 175.00	\$ 122.50			Jess Velez	Paralegal
8/31/22	0.1	Read/review incoming email or correspondence	JV read corr from PD re next steps	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
8/31/22	0.1	Propound (Send, Email) Documents	JV sent meet and confer letter to D	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
9/5/22	0.1	Ensure doc/item expected back is received (track, nag)	JV nagged oc for discovery items due in meet confer	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
9/5/22	0.4	Obtain/Secure Signature (RA/SA/Dec/Aff)	JV secured client signature on discovery responses	\$ 175.00	\$ 70.00			Jess Velez	Paralegal
9/5/22	0.2	Manage/Delegate/Assign	JV managed tasks in regard to disc responses, propounding, and noting milestones in case	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
9/5/22	0.4	Draft discovery responses (incl getting info from client) RPDs Rgs RFAs	Edit our resps to Ds' rogs	\$ 450.00	\$ 180.00			Penn Dodson	Partner
9/7/22	0.3	Read/review incoming email or correspondence	JV made proposed change to disc responses based on client's request	\$ 175.00	\$ 52.50			Jess Velez	Paralegal
9/7/22	0.2	Propound (Send, Email) Documents	JV resent corrected Disc Resp for verification so cl can sign	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
9/7/22	0.1	Manage/Delegate/Assign	JV updated tasks to show we are moving forward with discovery response	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
9/8/22	0.1	Send/Receive Texts	Jv nagged client for signature on disc resp	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
9/8/22	0.2	Compose/Send Email	JV emailed OC re time to discuss issues raised in PDs letter	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
9/8/22	0.1	Draft/Propound Standard/Form Letter	JV sent rogs resp to OC	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
9/8/22	0.1	Calendar Deadlines/ Appearances/ Dates	JV calendared resp date based on PD and OC email	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
9/13/22	0.1	Check Status	JV checked status of case based on RPD resp and upcoming deadline	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
9/14/22	0.5	Telephone Call	Louis Lombardi: 30 Min Phone Meeting	\$ 450.00	\$ 225.00			Penn Dodson	Partner
9/15/22	0.1	Manage/Delegate/Assign	JV managed tasks based on PDs' corr in re call with OC re meet confer re disc	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
9/16/22	0.2	Propound (Send, Email) Documents	JV resent discovery responses	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
9/16/22	0.2	Compose/Send Email	JV emailed client	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
9/16/22	0.1	Manage/Delegate/Assign	JV managed tasks - updated to reflect record of sending responses and looking forward at poss deposition	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
9/16/22	0.1	Read/review incoming email or correspondence	JV read corr re cl responses	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
9/16/22	0.1	Read/review incoming email or correspondence	JV read corr	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
9/16/22	0.6	Manage/Delegate/Assign	JV managed tasks generally -- reviewed case holistically, double checked deadlines and rearranged subtasks to make the parent task make most sense	\$ 175.00	\$ 105.00			Jess Velez	Paralegal

9/16/22	0.9	Draft discovery responses (incl getting info from client) RPDs Rgs RFAs	RPD resps, review dox to produce	\$ 450.00	\$ 405.00			Penn Dodson	Partner
9/19/22	0.5	Review/compile/organize/Bate s stamp discovery documents to produce	JV updated disc dox based on PD resp to OC and made sure disc is organized and ready for future use	\$ 175.00	\$ 87.50			Jess Velez	Paralegal
9/19/22	0.1	Read/review incoming email or correspondence	JV read corr between PD and OC	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
9/19/22	0.2	Compose/Send Email	EM OC recap of our meet & confer call	\$ 450.00	\$ 90.00			Penn Dodson	Partner
9/22/22	1	Admin - General Admin	add dox to TOC	\$ 95.00	\$ 95.00			Callyn Carter	Paralegal
9/23/22	0.2	Ensure doc/item expected back is received (track, nag)	JV checked status and nagged oc for documents requested	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
9/27/22	0.1	Check Status	JV checked status of case	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
9/28/22	0.2	Ensure doc/item expected back is received (track, nag)	JV nagged OCfor documents requested	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
9/30/22	0.2	Read/review incoming email or correspondence	JV read corr from OC in relation to requested documents	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
10/4/22	0.1	Read/review incoming email or correspondence	JV read corr	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
10/4/22	0.1	Manage/Delegate/Assign	Jv managed tasks y delegated out tasks in relation to next steps: OC not able to reach client... client non-responsive... continues to be an issue, so tasked out possible escalation	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
10/5/22	0.3	Calendar Deadlines/ Appearances/ Dates	JV read corr and calendared deadlines and tasks	\$ 175.00	\$ 52.50			Jess Velez	Paralegal
10/5/22	0.9	Draft Substantive Letter From Scratch	JV worked on joint status letter to JLR	\$ 175.00	\$ 157.50			Jess Velez	Paralegal
10/5/22	0.2		Resp to OC's EM re needing lots more time re disc responses	\$ 450.00	\$ 90.00			Penn Dodson	Partner
10/6/22	1.4	Draft Substantive Letter From Scratch	JV set up letter to JLR re status and discovery history	\$ 175.00	\$ 245.00			Jess Velez	Paralegal
10/6/22	0.1	Check Status	JV checked status of case/ reviewed past filings in docket to make sure nothing has been missed	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
10/6/22	0.5	Manage/Delegate/Assign	JV managed tasks y delegated out	\$ 175.00	\$ 87.50			Jess Velez	Paralegal
10/6/22	0.4	Draft Motion	JV set up motion	\$ 175.00	\$ 70.00			Jess Velez	Paralegal
10/6/22	0.5	Draft Motion	jv set up mtn for ext of time	\$ 175.00	\$ 87.50			Jess Velez	Paralegal
10/6/22	0.3	Substantive, High-Level Legal Document Drafting/Revisions	revise status report	\$ 450.00	\$ 135.00			Penn Dodson	Partner
10/7/22	0.2	ECF File Document	JV ecf filed dkt	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
10/7/22	0.5	Make Deposition Arrangements for Us Deposing Someone	JV worked on depo arrangements	\$ 175.00	\$ 87.50			Jess Velez	Paralegal
10/7/22	0.4	Calendar Deadlines/ Appearances/ Dates	JV calendared meeting times with interpreters	\$ 175.00	\$ 70.00			Jess Velez	Paralegal
10/7/22	0.1	Ensure doc/item expected back is received (track, nag)	JV nagged oc for documents ...	\$ 195.00	\$ 19.50			Jess Velez	Paralegal
10/9/22	0.9	Make Deposition Arrangements for Us Deposing Someone	JV prepped what to expect letter, notice of depo, and propounded. Tasked PD to edit 30b6 notice and topics	\$ 175.00	\$ 157.50			Jess Velez	Paralegal
10/10/22	0.4	Admin - General Admin	Propound ltr re attending other sides depo to CL	\$ 95.00	\$ 38.00			Callyn Carter	Paralegal
10/10/22	0.1	Read/review incoming email or correspondence	JV read corr re edits to joint status letter	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
10/10/22	0.1	Ensure doc/item expected back is received (track, nag)	JV nagged OC	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
10/10/22	0.1	Read/review incoming email or correspondence	JV read corr: OC convo w pd re jnt status letter cont.	\$ 175.00	\$ 17.50			Jess Velez	Paralegal

10/10/22	0.2	ECF File Document	JV ecf filed dkt	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
10/11/22	0.2	Calendar Deadlines/ Appearances/ Dates	JV calendared and tasked out appearance re order for post disc pre trial conf	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
10/13/22	0.1	Check Status	JV checked status of case	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
10/14/22	0.2	Propound (Send, Email) Documents	JV sent depo notices to oc	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
10/14/22	0.5	Check Status	60 Days to Discovery Close status check; edit 2 depo notices incl 30b6 topics; review progress of case generally	\$ 450.00	\$ 225.00			Penn Dodson	Partner
10/16/22	0.4	Set Up/Draft Letter	JV set up discovery dispute letter for pd to edit	\$ 175.00	\$ 70.00			Jess Velez	Paralegal
10/17/22	0.5	ECF File Document	JV ECF filed disc dispute letter	\$ 175.00	\$ 87.50			Jess Velez	Paralegal
10/17/22	0.1	Download/File ECF Document	JV downloaded y filed ecf dkt : Discovery dispute letter and exhibits	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
10/24/22	0.5	Research	JV researched judge rules to comply with requirements	\$ 175.00	\$ 87.50			Jess Velez	Paralegal
10/25/22	0.4	Deposition	Jv set up deposition appearance form for depo of D	\$ 175.00	\$ 70.00			Jess Velez	Paralegal
10/25/22	0.1	Manage/Delegate/Assign	JV managed tasks and delegated out in relation to depositons	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
10/25/22	0.2	Read/review incoming email or correspondence	JV read and reviewed corr re Ds notice of Deposition	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
10/27/22	0.4	Manage/Delegate/Assign	JV managed tasks generally in relation to Depo of P and Depo of D (including assigning tasks such as preparing client, drafting notices, coordinating times, hiring reporter etc)	\$ 175.00	\$ 70.00			Jess Velez	Paralegal
10/28/22	0.3	Make Deposition Arrangements for Us Deposing Someone	JV set up depo appearance form	\$ 175.00	\$ 52.50			Jess Velez	Paralegal
10/30/22	0.6	Read/review incoming email or correspondence	JV reviewed conflicted calendar entries and tasked out game plan for depositions	\$ 175.00	\$ 105.00			Jess Velez	Paralegal
10/31/22	0.2	Read/review incoming email or correspondence	JV read corr re OC req to speak with PD	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
10/31/22	0.2	Read/review incoming email or correspondence	JV read corr	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
10/31/22	0.2	Read/review incoming email or correspondence	JV read corr	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
10/31/22	0.2	Compose/Send Email	EM to OC re their notice of depo	\$ 450.00	\$ 90.00			Penn Dodson	Partner
11/3/22	0.2		EM to OC re him wanting to resched depo last minute???	\$ 450.00	\$ 90.00			Penn Dodson	Partner
11/4/22	0.2	Check Status	JV checked status of overall progress specifically in relation to memos of case files (evidence)	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
11/4/22	0.2	Read/review incoming email or correspondence	JV read corr in relation to D's evidence (memos/case files)	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
11/4/22	0.2	ECF File Document	JV ecf filed discovery dispute letter and saved to our system for future reference	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
11/4/22	0.2	Read/review incoming email or correspondence	JV gave Josselyn links to deposition items in order to help her prepare for deposition binder	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
11/4/22	0.2	Read/review incoming email or correspondence	JV read corr re preparation for deposition	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
11/4/22	0.2	Calendar Deadlines/ Appearances/ Dates	JV calendared y tasked out discovery dispute hearing	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
11/4/22	0.1	Compose/Send Email	JV emailed translator	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
11/4/22	0.1	Compose/Send Email	JV emailed client	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
11/4/22	2.1	Prep work/ Prepare for	Depo prep/problems issues: review disc resps, try calling OC, exchg EMs w him; task JG re binder, write judge letter	\$ 450.00	\$ 945.00			Penn Dodson	Partner
11/5/22	0.3	Draft Discovery Requests (RPDs, Rogs, RFAs)	JV set up P's 2nd set of Rogs	\$ 175.00	\$ 52.50			Jess Velez	Paralegal
11/5/22	0.3	Prep Court Appearance Form	JV set up court appearance form for disc dispute hearing	\$ 175.00	\$ 52.50			Jess Velez	Paralegal
11/7/22	0.2	Read/review incoming email or correspondence	JV read corr in re cancellation of Deposition of D	\$ 175.00	\$ 35.00			Jess Velez	Paralegal

11/9/22	0.2	Prep Court Appearance Form	jv updated CAF and pulled dkt in order to prep PD for new OC and evidentiary hearing	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
11/9/22	0.1	Read/review incoming email or correspondence	JV read corr	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
11/9/22	3.2	Travel	Local travel to/from SDNY for in person conference. Includes security + being ~15 min early.	\$ 200.00	\$ 640.00			Penn Dodson	Partner
11/9/22	0.5	Attend Court	Coker: In-Person Discovery Dispute Hearing	\$ 450.00	\$ 225.00			Penn Dodson	Partner
11/10/22	0.1	Read/review incoming email or correspondence	JV read corr re next steps in case (new attorney, reschedule deposition, and overall dispute plan)	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
11/11/22	0.3	Read/review incoming email or correspondence	JV read corr as previously mentioned, in re to discovery dispute plan going forward and deposition dates proposed	\$ 175.00	\$ 52.50			Jess Velez	Paralegal
11/11/22	0.3	Manage/Delegate/Assign	JV managed tasks y delegated out tasks in relation to judges order from discovery dispute conference	\$ 175.00	\$ 52.50			Jess Velez	Paralegal
11/11/22	0.2	Draft document (other)	JV set up letter to JLR re deposition dates	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
11/11/22	0.9	Compose/Send Email	Calls/EMs w OC, ltr to judge, ECF file it, EM the ECF bounce to OC since he hasn't filed a NOA yet.	\$ 450.00	\$ 405.00			Penn Dodson	Partner
11/14/22	0.2	Read/review incoming email or correspondence	JV read corr with OC re his intent to file a motion to stay case and our objection	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
11/14/22	0.1	Manage/Delegate/Assign	JV managed tasks in anticipation of D's mtn to stay case and our objection to it	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
11/14/22	0.1	Download/File ECF Document	JV downloaded y filed ecf dkt - rvw'd mtn and passed to pd to rvw	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
11/14/22	0.2	Read/review incoming email or correspondence	JV read order from judge and began setting up calendar based on setting of deposition dates	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
11/14/22	0.1	Compose/Send Email	JV emailed OC re deposition of P - in light of order and his mtn to stay	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
11/15/22	0.1	Manage/Delegate/Assign	JV managed tasks y delegated out in relation to deposition logistics	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
11/16/22	0.1	Compose/Send Email	JV emailed client	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
11/16/22	0.3	Coordinate Our Client's Deposition	Jv coordinated depo prep and logistics on zoom	\$ 175.00	\$ 52.50			Jess Velez	Paralegal
11/17/22	0.6	Research	JV researched naturopathic doctor stuff based on OC's claim client is seeing a doctor	\$ 175.00	\$ 105.00			Jess Velez	Paralegal
11/18/22	0.4	ECF File Document	JV ecf filed letter in opposition	\$ 175.00	\$ 70.00			Jess Velez	Paralegal
11/18/22	0.1	Download/File ECF Document	Jv downloaded y filed ecf dkt : Ps response in opposition to mtn to stay case	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
11/18/22	0.2	Manage/Delegate/Assign	jv managed tasks in relation to Ds' reply re mtn to stay case and updated deadline	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
11/19/22	0.2	Analysis/ Substantive Review	Review texts client sent + approve for production	\$ 450.00	\$ 90.00			Penn Dodson	Partner
11/21/22	0.8	Admin - General Admin	Turn dox into PDF, bates stamp, add to TOC	\$ 95.00	\$ 76.00			Callyn Carter	Paralegal
11/21/22	0.1	Manage/Delegate/Assign	JV managed y delegated tasks -- asked CC to pull P0092-P00104	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
11/21/22	0.1	Propound (Send, Email) Documents	jv sent oc supplemental discovery documents	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
11/21/22	0.1	Manage/Delegate/Assign	JV updated tasks in relation to finalizing the discovery disputes .. or lack of resolution..	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
11/21/22	0.3	Coordinate Our Client's Deposition	JV prepped "what to expect depo" letter for client and updated calendar	\$ 175.00	\$ 52.50			Jess Velez	Paralegal
11/22/22	0.2	Read/review incoming email or correspondence	Jv read Rvw'd Order for deposition and rescheduling conf	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
11/22/22	0.1	Compose/Send Email	JV emailed reporter re new date for deposition of D	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
11/22/22	0.2	Manage/Delegate/Assign	JV managed tasks y delegated out in relation to super delayed deposition and missing disc items	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
11/22/22	0.2	Calendar Deadlines/ Appearances/ Dates	Jv calendared y tasked out deadlines in relation to new deposition and internal deadlines to meet in order to prepare for depositions	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
11/22/22	0.1	Manage/Delegate/Assign	JV managed tasks y updated calendars based on new order	\$ 175.00	\$ 17.50			Jess Velez	Paralegal

11/28/22	0.5	Admin - General Admin	Set up depo appearance form	\$ 95.00	\$ 47.50			Callyn Carter	Paralegal
11/28/22	0.2	Read/review incoming email or correspondence	JV rwwd depo appearance form and updated tasks accordingly	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
11/29/22	0.1	Read/review incoming email or correspondence	jv read corr re depositions	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
11/29/22	0.2	Research	JV did background research on OC to get more information on who he is..or isnt.	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
11/29/22	0.1	Read/review incoming email or correspondence	JV read corr	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
11/29/22	0.4	Communicate with Client	Coker: Deposition Prep	\$ 450.00	\$ 180.00			Penn Dodson	Partner
11/30/22	0.1		EM OC re Lombardi needing to file a NOA before the depo	\$ 450.00	\$ 45.00			Penn Dodson	Partner
12/2/22	0.1	Download/File ECF Document	JV downloaded docket	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
12/2/22	0.2	Read/review incoming email or correspondence	JV reviewed order and discovery dates in relation to adjournment. and new depo date	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
12/2/22	0.5	Coordinate Our Client's Deposition	JV coordinated details for CL depo -	\$ 175.00	\$ 87.50			Jess Velez	Paralegal
12/5/22	0.1	Read/review incoming email or correspondence	JV read corr re deposition and passed info along to client and attorney calendar	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
12/5/22	0.1	Coordinate Our Client's Deposition	JV checked in w client and made she she is prepared for deposition	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
12/6/22	0.1		EM to OC requesting discovery items that came out of the depo	\$ 450.00	\$ 45.00			Penn Dodson	Partner
12/6/22	1.8	Deposition	Coker: Deposition of Sade Coker, notate impressions + EM client afterward	\$ 450.00	\$ 810.00			Penn Dodson	Partner
12/14/22	0.1	Manage/Delegate/Assign	JV updated task lists in relation to discovery - reassigned dates	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
12/14/22	0.2	Ensure doc/item expected back is received (track, nag)	JV nagged OC re missing footage and late rogs response	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
12/16/22	0.5	Admin - General Admin	Find out when depo of d is, add to letter, propound/em to CL	\$ 95.00	\$ 47.50			Callyn Carter	Paralegal
12/20/22	0.1	Read/review incoming email or correspondence	JV read corr related to Ds' ROGS response	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
12/20/22	0.1	Read/review incoming email or correspondence	JV read corr from D re lack of response to Rogs.. he had time but will not respond until his client returns... he could have worked ahead of time.. confusing.	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
12/20/22	0.1	Compose/Send Email	EM to OC re discovery responses	\$ 450.00	\$ 45.00			Penn Dodson	Partner
12/28/22	0.1	Manage/Delegate/Assign	JV managed/shifted/triaged tasks related to depo	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
1/15/23	0.3	Propound (Send, Email) Documents	JV set up and resent notices of depo for upcoming deposition	\$ 175.00	\$ 52.50			Jess Velez	Paralegal
1/15/23	0.2	Manage/Delegate/Assign	JV managed tasks y delegated out	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
1/16/23	0.1	Read/review incoming email or correspondence	JV read corr from OC and checked status of upcoming deposition	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
1/16/23	0.4	Proofread or Set Up Document	JV set up depo appearance form	\$ 175.00	\$ 70.00			Jess Velez	Paralegal
1/19/23	0.2	Compose/Send Email	JV emailed client y updated tasks re: D requesting another month stay for her deposition...	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
1/25/23	0.2	Compose/Send Email	JV emailed BDorsey re depo cancellation-- cancelled depo AGAIN due to D's intentional delay....	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
1/31/23	0.2	Compose/Send Email	JV emailed OC requesting he file with the court if he will not go forward with 2/6 depo. and also asked about discovery responses	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
1/31/23	0.2	Download/File ECF Document	JV downloaded y filed ecf dkt: Rvw'd Ds' Mtn for Extension for Deposition....	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
2/6/23	0.6	Manage/Delegate/Assign	JV managed tasks y delegated out tasks in anticipation of next steps in case -- updated calendars as directed by attorney	\$ 175.00	\$ 105.00			Jess Velez	Paralegal
2/15/23	0.1	Calendar Deadlines/ Appearances/ Dates	JV calendared Defendants' surgery and made note in task management software	\$ 175.00	\$ 17.50			Jess Velez	Paralegal

2/16/23	0.1	Propound (Send, Email) Documents	Jv emailed OC for transcript	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
2/21/23	0.2	Ensure doc/item expected back is received (track, nag)	JV EM'd OC to follow up on March 6 deposition.. to confirm that the procedure has finally taken place, that there will not be more delays, and we will be able to depose Def. Also asked for remaining discovery items	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
2/23/23	0.1	Read/review incoming email or correspondence	JV read corr from OC stating he has no update from client and that he does not have remaining disc for us	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
2/23/23	0.5	Deposition	JV updated deposition notices and made additional edits to depo appearance form	\$ 175.00	\$ 87.50			Jess Velez	Paralegal
2/23/23	0.5	Edit Document	JV updated deposition appearance form for.. depo that may or may not happen..	\$ 175.00	\$ 87.50			Jess Velez	Paralegal
2/25/23	0.1	Check Status	JV made sure deposition Is on CTA's calendar so that he can attend	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
2/26/23	0.3	Research Procedural/Judge Rule	JV reviewed judge rules to make sure we are in compliance w requirements with disc dispute letter	\$ 175.00	\$ 52.50			Jess Velez	Paralegal
2/26/23	0.3	Set Up/Draft Letter	JV set up basic letter motion for discovery dispute	\$ 175.00	\$ 52.50			Jess Velez	Paralegal
2/27/23	0.5	Set Up/Draft Letter	JV worked on Disc dispute letter based on attorney's direction	\$ 175.00	\$ 87.50			Jess Velez	Paralegal
2/27/23	0.6	Set Up/Draft Letter	JV continued work on discovery dispute letter	\$ 175.00	\$ 105.00			Jess Velez	Paralegal
2/28/23	0.1	Proofread or Set Up Document	JV made small update to discovery dispute letter	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
3/1/23	0.1	Compose/Send Email	EM OC re outstanding disc reqs	\$ 450.00	\$ 45.00			Penn Dodson	Partner
3/2/23	0.5	Telephone Call	Call OC 2x (VM); EMs to & from; work on ltr to judge	\$ 450.00	\$ 225.00			Penn Dodson	Partner
3/4/23	0.1	Read/review incoming email or correspondence	JV read corr between PD and OC re attempts to meet and confer for discovery dispute	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
3/4/23	0.4	Prep work/ Prepare for	depo prep	\$ 450.00	\$ 180.00			Penn Dodson	Partner
3/5/23	2.5	Prep work/ Prepare for	Prepare for Desposition	\$ 475.00	\$ 1,187.50			Christopher Anderson	Partner
3/5/23	3.6	Prep work/ Prepare for	depo prep	\$ 450.00	\$ 1,620.00			Penn Dodson	Partner
3/6/23	2	Prep work/ Prepare for	Prepare for Desposition	\$ 475.00	\$ 950.00			Christopher Anderson	Partner
3/6/23	3.9	Deposition	Depose Defendant and 30(b)(6)	\$ 475.00	\$ 1,852.50			Christopher Anderson	Partner
3/6/23	0.3	Telephone Call	Assist with logistics of getting deposition going - deponent late, OC later, etc.	\$ 450.00	\$ 135.00			Penn Dodson	Partner
3/7/23	0.3	Deposition	Follow up notes re: deposition.	\$ 475.00	\$ 142.50			Christopher Anderson	Partner
3/7/23	0.2	Calendar Deadlines/ Appearances/ Dates	JV calendared Ds deadline to produce documents as requested by PD in her Follow up email post deposition of defendant- tasked out next steps in relation to gathering requested documents	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
3/12/23	0.2	Manage/Delegate/Assign	JV managed tasks y delegated out to make sure that we are moving along in terms of building our case and are meeting deadlines	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
3/16/23	0.1	Read/review incoming email or correspondence	JV read internal correspondence in re to Ds' lack of response to requested documents...	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
3/19/23	0.1	Check Status	JV checked status of case and checked in with team to see if we have yet to receive the requested documents...	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
3/21/23	0.1	Ensure doc/item expected back is received (track, nag)	JV emailed reporter for copy of transcript	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
3/21/23	0.2	Set Up/Draft Letter	JV set up discovery dispute letter to judge	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
3/21/23	0.3	ECF File Document	JV ecf filed letter mtn for discovery dispute conf (prepped documents and filed)	\$ 175.00	\$ 52.50			Jess Velez	Paralegal
3/23/23	0.2	Manage/Delegate/Assign	JV managed tasks based on Order of Def to Respond	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
3/26/23	0.3	Read/review incoming email or correspondence	JV read corr, downloaded dkt and checked rules to see if reply is permitted	\$ 175.00	\$ 52.50			Jess Velez	Paralegal

3/27/23	0.2	Calendar Deadlines/ Appearances/ Dates	JV Calendar and tasked out deadlines based on Order for Ds to produce all documents	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
3/29/23	0.3	Read/review incoming email or correspondence	JV read SOP on prepping a MSJ	\$ 175.00	\$ 52.50			Jess Velez	Paralegal
3/29/23	1	Research Procedural/Judge Rule	JV reviewed rules over MSJ drafting and determined what is necessary-- JV also set up pre-mtn conference letter	\$ 175.00	\$ 175.00			Jess Velez	Paralegal
3/31/23	0.3	Calendar Deadlines/ Appearances/ Dates	Jv calendared and tasked out deadlines - based on Ps ltr mtn for anticipated summary judgment	\$ 175.00	\$ 52.50			Jess Velez	Paralegal
3/31/23	0.2	Read/review incoming email or correspondence	Review D's Resp to Discovery Dispute letter y Judge Order	\$ 450.00	\$ 90.00			Penn Dodson	Partner
4/4/23	0.2	Read/review incoming email or correspondence	JV reviewed D's response to P's Mtn for MSJ Conf- shared with attorney and saved to case file	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
4/4/23	0.4	Read/review incoming email or correspondence	JV reviewed all issues for CAF and prepped team on what to expect while JV away	\$ 175.00	\$ 70.00			Jess Velez	Paralegal
4/6/23	0.4	Draft Substantive Letter From Scratch	Ltr to judge in opp to OC's last minute request to adjourn next Monday's conference	\$ 450.00	\$ 180.00			Penn Dodson	Partner
4/10/23	0.8	Prep work/ Prepare for	Prep for Post-Discovery Pre-Trial Conference	\$ 450.00	\$ 360.00			Penn Dodson	Partner
4/10/23	0.5	Attend Court	Post-Discovery Pre-Trial Conference (by MS Teams)	\$ 450.00	\$ 225.00			Penn Dodson	Partner
4/11/23	0.2	Download/File ECF Document	JV downloaded y filed ecf filed dkt -- our Resp to Ds' request to adjourn conference,	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
4/11/23	0.1	Download/File ECF Document	JV downloaded docket and updated the calendar and tasks	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
4/11/23	0.2	Manage/Delegate/Assign	JV tasked out payment of transcript	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
4/12/23	0.1	Calendar & Task Out All Deadlines/ Appearances/ Dates From Scheduling Order/CMO/TMO	JV calendared and tasked out all dates and appearances from order from status conference	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
4/18/23	0.4	Review/compile/organize/Bate s stamp discovery documents to produce	JV reviewed OC's discovery production	\$ 175.00	\$ 70.00			Jess Velez	Paralegal
4/18/23	0.5	Set Up/Draft Letter	JV reviewed orders and set up letter to judge for PD and tasked PD to review	\$ 175.00	\$ 87.50			Jess Velez	Paralegal
4/20/23	0.1	Check Status	Jv checked status of case, esp in regard to out letter to JLR re briefing schedule	\$ 175.00	\$ 17.50			Jess Velez	Paralegal
4/20/23	0.7	Set Up/Draft Letter	Jv pulled exhibits for letter to jlr re briefing schedule	\$ 175.00	\$ 122.50			Jess Velez	Paralegal
4/20/23	0.5	Set Up/Draft Letter	JV pulled exhibits for letter	\$ 175.00	\$ 87.50			Jess Velez	Paralegal
4/20/23	0.5	ECF File Document	JV ecf filed proposed briefing schedule with supporting exhibits	\$ 175.00	\$ 87.50			Jess Velez	Paralegal
4/21/23	0.3	Calendar Deadlines/ Appearances/ Dates	JV calendared and tasked out MSJ deadlines based on briefing schedule	\$ 175.00	\$ 52.50			Jess Velez	Paralegal
4/24/23	1.1	Set Up/Draft Motion	JV pulled exhibits for motion for summary judgment	\$ 175.00	\$ 192.50			Jess Velez	Paralegal
4/25/23	0.5	Proofread or Set Up Document	JV read motion and edited for documents related to -- mtn for sanctions - letter to jlr re discovery deficiency	\$ 175.00	\$ 87.50			Jess Velez	Paralegal
4/25/23	0.2	Prep work/ Prepare for	JV prepared docs for filing	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
4/25/23	0.6	Set Up/Draft Letter	JV worked on proofing letter	\$ 175.00	\$ 105.00			Jess Velez	Paralegal
4/25/23	0.4	Prep work/ Prepare for	JV prepared document for filing and worked with JShaner to prepare courttest copy	\$ 175.00	\$ 70.00			Jess Velez	Paralegal
4/28/23	0.2	Read/review incoming email or correspondence	JV prepped materials for sending courtesy copy	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
4/28/23	1.1	ECF File Document	JV ecf Filed mtn for sanctions	\$ 175.00	\$ 192.50			Jess Velez	Paralegal
4/30/23	0.2	Download/File ECF Document	JV downloaded y filed ecf dkt	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
5/4/23	0.5	Research	JV reviewed deadlines related to discovery dispute letter - made sure calendar matches tasks and that internal tasks are set up in a way so that we will meet hard deadlines	\$ 175.00	\$ 87.50			Jess Velez	Paralegal
5/4/23	0.3	ECF File Document	JV prepped and ECF filed letter mtn	\$ 175.00	\$ 52.50			Jess Velez	Paralegal

5/5/23	0.2	Read/review incoming email or correspondence	JV read corr and updated tasks	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
5/19/23	0.2	Calendar Deadlines/ Appearances/ Dates	JV calendared and tasks out reply	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
5/22/23	0.2	Set Up/Draft Letter	JV set up letter for PD to edit	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
6/7/23	0.3	Compose/Send Email	jv updated client and sent email out	\$ 175.00	\$ 52.50			Jess Velez	Paralegal
6/20/23	0.3	Call	JV called client and updated her as to MSJ status	\$ 175.00	\$ 52.50			Jess Velez	Paralegal
6/20/23	0.2	Proofread or Set Up Document	JV set up basic declaration	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
6/20/23	3.8	L240 Dispositive Motions	MSJ	\$ 450.00	\$ 1,710.00			Penn Dodson	Partner
6/22/23	0.7	Read/review incoming email or correspondence	JV read judge rules and set up relevant documents	\$ 175.00	\$ 122.50			Jess Velez	Paralegal
6/22/23	5.2	L240 Dispositive Motions	Draft MSJ	\$ 450.00	\$ 2,340.00			Penn Dodson	Partner
6/23/23	1.6	Assemble / gather / collect documents together	JV reviewed documents for mtn for summary judgment	\$ 175.00	\$ 280.00			Jess Velez	Paralegal
6/23/23	1.1	ECF File Document	JV ecf filed MSJ	\$ 175.00	\$ 192.50			Jess Velez	Paralegal
6/23/23	0.2	Download/File ECF Document	JV downloaded y filed ecf dkt	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
6/23/23	3.1	L240 Dispositive Motions	Work on MSJ	\$ 450.00	\$ 1,395.00			Penn Dodson	Partner
6/25/23	0.2	Periodic Case Review	check status generally 00348 Coker v Goldberg & Associates	\$ 450.00	\$ 90.00			Penn Dodson	Partner
6/26/23	0.2	ECF File Document	JV refiled supporting documents in Coker	\$ 175.00	\$ 35.00			Jess Velez	Paralegal
7/13/23	0.2	Calendar Deadlines/ Appearances/ Dates	JV calendared and tasked out MSJ reply and courtesy copy	\$ 195.00	\$ 39.00			Jess Velez	Paralegal
7/19/23	0.2	Edit Document	JV edited Lucy's draft and made small suggestions	\$ 195.00	\$ 39.00			Jess Velez	Paralegal
7/19/23	0.5	L240 Dispositive Motions	Set up Plaintiff's Reply to Defendants' Response to Plaintiff's Motion for Summary Judgment.	\$ 195.00	\$ 97.50			Lucy Espinal	Paralegal
7/26/23	0.1	Periodic Case Review	JV reviewed case	\$ 195.00	\$ 19.50			Jess Velez	Paralegal
7/27/23	0.2	Read/review incoming email or correspondence	JV read corr and updated rules	\$ 195.00	\$ 39.00			Jess Velez	Paralegal
7/28/23	0.2	Read/review incoming email or correspondence	JV went over courtesy copy process with lucy	\$ 195.00	\$ 39.00			Jess Velez	Paralegal
7/30/23	0.2	Periodic Case Review	check status generally 00348 Coker v Goldberg & Associates	\$ 450.00	\$ 90.00			Penn Dodson	Partner
8/7/23	0.2	Read/review incoming email or correspondence	JV read corr and updated tasks	\$ 195.00	\$ 39.00			Jess Velez	Paralegal
8/8/23	0.5	Draft document (other)	JV drafted mtn and passed to PD to edit.	\$ 195.00	\$ 97.50			Jess Velez	Paralegal
8/9/23	0.2	Analysis/ Substantive Review	Review and edit Letter for extension of time.	\$ 475.00	\$ 95.00			Christopher Anderson	Partner
8/9/23	0.6	Manage/Delegate/Assign	JV managed logistics around getting MSJ filed and rcv'ing reply	\$ 195.00	\$ 117.00			Jess Velez	Paralegal
8/9/23	0.3	File Document with Courts	JV updated mtn and ecf filed	\$ 195.00	\$ 58.50			Jess Velez	Paralegal
8/9/23	0.2	Read/review incoming email or correspondence	JV read corr and updated tasks	\$ 195.00	\$ 39.00			Jess Velez	Paralegal
8/20/23	1.3	Edit Document	MSJ reply; legal research	\$ 450.00	\$ 585.00			Penn Dodson	Partner
8/25/23	0.5	Document Review	Review reply/ to response Motion for Summary Judgment	\$ 175.00	\$ 87.50			Jessica Balint	Paralegal
8/25/23	0.6	File Document with Courts	Filed: Reply to Response/ Affirming legal arguments for motion for summary Judgment	\$ 175.00	\$ 105.00			Jessica Balint	Paralegal
8/25/23	1.4	Prepare mailing/package	prepped courtesy copy for Judge Moses	\$ 175.00	\$ 245.00			Jessica Balint	Paralegal
8/28/23	0.5	Draft document (other)	Drafted cover letter to judge Moses for Courtesy Copy	\$ 175.00	\$ 87.50			Jessica Balint	Paralegal
8/28/23	0.5	Prepare mailing/package	Courtesy copy prepared and mailed	\$ 175.00	\$ 87.50			Jessica Balint	Paralegal
9/14/23	0.1	Periodic Case Review	JV reviewed case	\$ 195.00	\$ 19.50			Jess Velez	Paralegal
9/20/23	0.1	Periodic Case Review	jv rvw case	\$ 195.00	\$ 19.50			Jess Velez	Paralegal
9/21/23	0.2	Compose/Send Email	JV emailed client status update	\$ 195.00	\$ 39.00			Jess Velez	Paralegal
9/30/23	0.2	Periodic Case Review	check status generally 00348 Coker v Goldberg & Associates	\$ 450.00		\$ 90.00	0.2	Penn Dodson	Partner
10/30/23	0.2	Periodic Case Review	check status generally 00348 Coker v Goldberg & Associates	\$ 450.00		\$ 90.00	0.2	Penn Dodson	Partner
11/28/23	0.2	Periodic Case Review	check status generally 00348 Coker v Goldberg & Associates	\$ 450.00		\$ 90.00	0.2	Penn Dodson	Partner

12/4/23	0.1	Read/review incoming email or correspondence	JV rvwd court order to ref case to BCM	\$ 195.00	\$ 19.50			Jess Velez	Paralegal
1/2/24	0.2	Periodic Case Review	check status generally 00348 Coker v Goldberg & Associates	\$ 450.00		\$ 90.00	0.2	Penn Dodson	Partner
1/29/24	0.2	Periodic Case Review	check status generally 00348 Coker v Goldberg & Associates	\$ 450.00		\$ 90.00	0.2	Penn Dodson	Partner
2/2/24	0.1	Read/review incoming email or correspondence	JV read oc's mtg and asked pd if she would like to respond...	\$ 195.00	\$ 19.50			Jess Velez	Paralegal
2/6/24	0.3	Read/review incoming email or correspondence	JV rvw'd order, updated calendar and tasks to reflect Ds' upcoming objection and our response, and reviewed federal rules of evidence to make sure we have correct of days for response	\$ 195.00	\$ 58.50			Jess Velez	Paralegal
2/8/24	0.8	Research	Research FRCP, SDNY rules and judge's personal rules for time given in responding to an objection to a court order.	\$ 195.00	\$ 156.00			Lucy Espinal	Paralegal
2/14/24	0.2	File Document with Courts	JV processed in ECF dkt and saved to our filing system	\$ 195.00	\$ 39.00			Jess Velez	Paralegal
2/14/24	0.3	Draft document (other)	Set up letter motion in response to defendant's objection to court order on discovery sanctions.	\$ 195.00	\$ 58.50			Lucy Espinal	Paralegal
2/16/24	0.5	Read/review incoming email or correspondence	JV rvw'd docket and compared it to drafted letter	\$ 195.00	\$ 97.50			Jess Velez	Paralegal
2/29/24	0.2	Periodic Case Review	check status generally 00348 Coker v Goldberg & Associates	\$ 450.00		\$ 90.00	0.2	Penn Dodson	Partner
3/1/24	0.1	Process Documents	JV rvw'd court's final order/judgment processed into sharepoint and set tasks to calendar deadline to object	\$ 195.00	\$ 19.50			Jess Velez	Paralegal
3/2/24	0.7	Admin - General Admin	JV reviewed time entries and made sure they're accurate and relevant	\$ 195.00		\$ 136.50	0.7	Jess Velez	Paralegal
TOTALS	206.4				\$ 53,667.00	\$ 798.00	3.0		
			<i>overall average rate</i>	<i>\$ 260.01</i>					
					<i>\$ 1,593.97</i>	<i>costs</i>			
					<i>\$ 55,260.97</i>	<i>total</i>			